

## Chavez, Richard - Washington, DC

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Public Comments on Procurement of Commodities for Foreign Donation:=====

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General Comment: To Whom it May Concern,

I am a former Peace Corps Volunteer and a current student of International Affairs, Humanitarian Aid and US Agriculture, I find this proposed rule incredibly important to our country's ability to provide aid in a timely and financially reasonable fashion under Title II of Public Law 480.

It is encouraging to note that this proposed rule has been reopened for comment, it is an important issue that should be properly analyzed by the public, and its complexity merits a longer comment period.

The US's system of providing food aid to developing countries and areas suffering from civil strife or natural disaster has outgrown the traditional two-step bidding process in place for many years. This system was established when carrier tariff rates were fixed, and could easily be paired with commodity bids to get the lowest-landed cost of transporting the food aid. However, today once the CCC and the KCCO (Kansas City Commodity Office) have determined the lowest-landed cost given unfixed carrier tariff rates, they must then go back and request freight rate bids.

This is an inefficient process that prevents the prompt delivery of food aid to areas in need. It also makes it difficult for the KCCO and USAID (who actually handles the purchasing of freight rates) to budget how much they will need for the total cost of shipping.

The time-lag is unnecessary, and although it may take some time for the KCCO to develop the technical capacity to deal with all this data simultaneously it is a worthwhile investment in progressively improving our food aid distribution system.

The next step will be decreasing the percentage of Title II food aid that needs to be purchased in the US for donations overseas.

Thank you for your time.